

REMARKS/ARGUMENTS

Claims 1-13, 15-28, 30-43 and 45 are pending in the present application. Claims 1, 8, 9, 15, 16, 23, 24, 30, 31, 38, 39 and 45 have been amended herewith. No new matter has been added by any of the amendments to the claims. Reconsideration of the claims is respectfully requested.

I. 35 U.S.C. § 102, Anticipation

The Examiner rejected Claims 1, 9, 11-13, 16, 26-28, 31, 39, 41 and 43 under 35 U.S.C. § 102(b) as being anticipated by Nielsen (US Patent No. 5,899,975). This rejection is respectfully traversed.

With respect to Claim 1, such claim has been amended in accordance with the preferred embodiment described in the Specification at page 18, lines 18-23 and page 21, line 13 – page 23, line 5. Per the features of Claim 1, subset style sheets are selected and merged into a composite style sheet such that the composite style sheet can be customized per the particular rendering characteristics of the client device – thereby advantageously providing an automated technique for support a diverse base of client devices. In contrast, per the teachings of Nielsen, the only client device physical characteristics that are used in generating the presentation style sheet are the physical device location of where a style sheet is locally stored (Nielsen col. 5, line 65 – col. 6, line 1). No type of presentation or rendering characteristic or capability is used when generating such presentation style sheet. In fact, Nielsen teaches a system that in effect operates just the opposite of the techniques of Claim 1. Per the steps of Claim 1, a style sheet is generated based upon specific rendering capabilities of the client device, whereas Nielsen builds a stylesheet without regard to device rendering characteristics, *and then modifies the properties of the device in accordance with the stylesheet* (Nielsen col. 7, lines 35-48). This results in diminished device support when compared with the resulting advantages of the present invention (providing device support for a large number of diverse client device types), as evidenced by the fact that if the Nielsen client computer does not support the presentations that are attempted to be made to a user, they are simply discarded/ignored (Nielsen col. 8, lines 15-20). In contrast, per the techniques of Claim 1, a customized presentation of an electronic document may be provided to a user of a requesting client device without having to have a specific style sheet stored for the particular document a priori (Specification page 25, lines 1-4), by virtue of the fact that the composite style sheet is in effect customized based upon the particular rendering characteristics of the client device. Thus, the invention of Claim 1 provides an advancement to the state of the art, as evidenced by the Nielsen teachings, and thus is not anticipated by Nielsen.

With respect to Claim 9, such claim has been amended to include the feature of “wherein the composite style sheet comprises a plurality of subset style sheets previously selected and merged together

to create the composite style sheet based upon rendering characteristics of a client device requesting the electronic document". For similar reasons to those described above with respect to Claim 1, the cited reference does not take into account or otherwise use rendering characteristics of a client device to assist in selection and merging of style sheets into a composite style sheet. Thus, amended Claim 9 is not anticipated by the cited reference as every element of the claimed invention is not identically shown in a single reference.

With respect to Claim 11, it is urged that the cited reference does not teach the claimed feature of "determining if a client device to which the electronic document is to be sent is capable of rendering the electronic document using the composite style sheet". As can be seen, Claim 11 expressly recites a step of determining whether a client device is capable of rendering the electronic document using the composite style sheet. In rejecting Claim 11, the Examiner cites Nielsen's teaching at figure 7, #700-725; figure 8; and col. 7, lines 1-15 and states that this claimed feature is taught since Nielson teaches that "the electronic document is downloaded or imported to a client device with a reference to an external stylesheet shows sending said document to a client device with a reference to an external style sheet". Applicants urge that for a reference to anticipate the invention of Claim 11, *every element* of Claim 11 must be identically shown in a single reference¹. The above Examiner assertions with respect to Nielsen's teachings do not establish any type of client device rendering capability determination, but rather merely allege a teaching of sending a document to a client device with a reference to an external style sheet. Claim 11 goes further, and expressly recites "determining if a client device to which the electronic document is to be sent is capable of rendering the electronic document using the composite style sheet" *in addition to* the claimed step of "sending the electronic document to the client device with a reference to the composite style sheet". The cited reference does *not* teach such client device rendering capability determination, and instead simply disregards any incompatible style sheet statements (Nielsen col. 8, lines 15-20). Thus, it is urged that Claim 11 has been erroneously rejected under 35 USC 102(b) as every element of the claimed invention is not identically shown in a single reference.

Applicants initially traverse the rejection of Claim 12 for reasons given above with respect to Claim 11 (of which Claim 12 depends upon). Further, Claim 12 specifically recites a step of "rendering the electronic document using the composite style sheet and sending the rendered electronic document to the client device, if the client device is not capable of rendering the electronic document using the composite style sheet". As can be seen, if the client device is not capable of rendering the electronic document using the composite style sheet, the electronic document is rendered prior to it being sent (in

¹ For a prior art reference to anticipate in terms of 35 U.S.C. 102, every element of the claimed invention must be identically shown in a single reference. *In re Bond*, 910 F.2d 831, 15 USPQ2d 1566 (Fed. Cir. 1990).

rendered form) to the client device. In rejecting Claim 12, the Examiner states that since Nielson teaches at figure 8 and col. 7, lines 1-15 that the electronic document is downloaded or imported to a client device with a reference to an external stylesheet which is retrieved from the network, this implies that the client device is not capable of rendering the style sheet. Applicants urge that to the contrary, since the reference to the style sheet is sent to the client device, this implies just the opposite – that the client device *can* provide the rendering functionality as it is sent a reference to the style sheet that it needs for such rendering. If the client device was not capable of rendering the document, there would be no reason to send the reference to an external style sheet to the client device, for retrieval by the client device, as the primary purpose of the style sheet is to perform rendering of a document. As there is no other purpose for sending this style sheet external reference to the client device, the client device must be capable of rendering the document using the style sheet that is retrieved by the client device using the external reference to the style sheet that was sent to the client device. Thus, the implication drawn by the Examiner per the teachings of the cited reference is incorrect, and in fact *just the opposite implication* exists per the Nielson teachings – that the client device *can* render the document. Thus, Claim 12 is further shown to have been erroneously rejected, as there are additional claimed features not taught by the cited reference.

Applicants traverse the rejection of Claims 13, 16, 26-28, 31, 39, 41 and 43 for similar reasons to those given above with respect to Claims 1, 9, 11 and 12, respectively.

Therefore, the rejection of Claims 1, 9, 11-13, 16, 26-28, 31, 39, 41 and 43 under 35 U.S.C. § 102(b) has been overcome.

II. 35 U.S.C. § 103, Obviousness

The Examiner rejected Claims 2-7, 15, 17-23, 30, 32-37 and 45 under 35 U.S.C. § 103 as being unpatentable over Nielsen (US Patent No. 5,899,975) as applied to claims 1, 16 and 31 above, and in further view of Walsh (*The Extensible Style Language: (XSL) Styling XML Documents*, Web Techniques, Jan 1999, vol. 4, iss. 1, pg. 49, 5 pgs printed from ProQuest as pages 1-10). This rejection is respectfully traversed.

Applicants initially traverse such rejection for similar reasons to those given above with respect to the missing claimed features identified above with respect to Claim 1.

Further with respect to Claim 7, such claim recites “wherein identifying a plurality of subset style sheets further includes matching values of the first level child elements to characteristic identifiers of subset style sheets in a subset style sheet repository *and selecting* the plurality of subset style sheets from the subset style sheets in the subset style sheet repository *based on whether* the first level child element values match characteristic identifiers for the subset style sheets” (emphasis added). As can be seen, this

claim is directed to particular techniques used to actually identify/select the plurality of subset style sheets (which are then merged to create the composite style sheet, per Claim 1). In rejecting Claim 7, the Examiner cites Walsh's teaching at page 8 and page 3 as teaching this claimed feature since Walsh teaches an "XSL processor that starts at the root node until the last child node *to process the style sheet templates*" (emphasis added). Applicants urge error, in that the Walsh style sheet has already been selected as it is being processed to render the document per these Walsh teachings. Quite simply, this passage describes a particular rendering technique. In contrast, Claim 7 is directed to a specific technique for how to initially select a style sheet that is to be merged into a composite style sheet (which could then be rendered per the Walsh cited techniques). Rendering a document using a style sheet, as taught by Walsh, is very different from selecting style sheets to be merged into a composite style sheet, as per Claim 7. It is thus further urged that Claim 7 has been erroneously rejected, as there are additional claimed features not taught or suggested by any of the cited references.

With respect to Claim 15, such claim has been amended to define the term 'card', and it is urged that none of the cited references teach or suggest the claimed card generation, which advantageously provides style sheet customization for wireless markup language-compliant devices. Thus, amended Claim 15 is not obvious in view of the cited references.

Applicants further traverse the rejection of Claims 22 and 37 for similar reasons to the further reasons given above with respect to Claim 7.

Applicants further traverse the rejection of Claims 30 and 45 for similar reasons to the further reasons given above with respect to Claim 15.

Therefore, the rejection of Claims 2-7, 15, 17-23, 30, 32-37 and 45 under 35 U.S.C. § 103 has been overcome.

III. 35 U.S.C. § 103, Obviousness

The Examiner rejected Claims 8, 24 and 38 under 35 U.S.C. § 103 as being unpatentable over Nielsen (US Patent No. 5,899,975). This rejection is respectfully traversed.

Applicants initially traverse such rejection for similar reasons to those given above with respect to missing claimed features identified above with respect to Claim 1.

Still further, Applicants have amended Claim 8 to recite that the composite style sheet is stored and associated with a client device such that this composite style sheet can be subsequently retrieved in order to avoid having to re-generate the customized composite style sheet during processing associated with a subsequent document request. None of the cited references teach such re-use of a dynamically generated and customized composite style sheet, and thus it is urged that amended Claim 8 is not obvious in view of the cited references.

Applicants further traverse the rejection of Claims 24 and 38 for similar reasons to the further reasons given above with respect to Claim 8.

Therefore, the rejection of Claims 8, 24 and 38 under 35 U.S.C. § 103 has been overcome.

IV. 35 U.S.C. § 103, Obviousness

The Examiner rejected Claims 10, 25 and 40 under 35 U.S.C. § 103 as being unpatentable over Nielsen (US Patent No. 5,899,975), in view of Walsh (*The Extensible Style Language: [XSL] Styling XML Documents*, Web Techniques, Jan 1999, vol. 4, iss. 1, pg. 49, 5 pgs, printed from ProQuest as pages 1-10) and in further view of Feibus (Visual InterDev Improves, InformationWeek, September 28, 1998, iss. 702, pg. 18, 2 pgs, printed from ProQuest as pages 1-3). This rejection is respectfully traversed.

Applicants traverse such rejection for similar reasons to those given above with respect to the missing claimed features identified above with respect to Claim 1.

Therefore, the rejection of Claims 10, 25 and 40 under 35 U.S.C. § 103 has been overcome.

V. Conclusion

It is respectfully urged that the subject application is patentable over the cited references and is now in condition for allowance. The Examiner is invited to call the undersigned at the below-listed telephone number if in the opinion of the Examiner such a telephone conference would expedite or aid the prosecution and examination of this application.

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Respectfully submitted,



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